

## **REMARKS/ARGUMENTS**

Applicants have carefully considered the Office Action mailed April 3, 2008, and respectfully requests reconsideration in view of the following remarks.

### **I. Information Disclosure Statement**

Copies of Foreign and Non-Patent Literature previously cited are provided herewith as requested.

### **II. Rejection of the Claims**

#### **A. Independent Claims**

In the Office action, claims 19, 25, and 31 were rejected as allegedly being obvious over United States patent number 5,103,404 to McIntosh in view of admitted prior art [hereinafter referred to as APA].

The rejection states in part:

McIntosh does not disclose wherein the haptic feedback including a modulating force simulating a plurality of electronically defined stop positions. Applicant's Admitted Prior Art on page 2, line 17-page 3, line 5 teach where it is well known in the art where haptic feedback devices have control wheel that exhibit tactile responsiveness, such as detents or clicks as they are rotated, wherein each click is a modulating force simulating a plurality of electronically defined stop positions, such that each click corresponds to one frame. Therefore, it would have been obvious to include in McIntosh the modulating force simulating a plurality of electronically defined stop positions as taught by AAPA, as the stop positions enable the user to determine frame rates as discussed on pages 2 and 3 of applicant's specification.

Applicant respectfully disagrees.

The background art described in the present specification relates to a video editing station having a control console including control wheels that provide tactile feedback (detents or clicks) in a *purely mechanical* fashion, without the use of electronics.

McIntosh does not contain any description of tactile feedback in the form of detents or clicks, nor would it have been obvious to provide the apparatus of McIntosh with detents or clicks. The application described by McIntosh—the control of robotic manipulators for handling

nuclear waste—is distinctly different than that of video editing, and would not benefit from the provision of detents or clicks.

The only possible argument in favor of providing the apparatus of McIntosh with a modulating force simulating a plurality of electronically defined stop positions is the general argument that, given an apparatus having *electronically controlled* tactile feedback, it would have been obvious to provide it with any known type of *mechanically controlled* tactile feedback, and to provide the same by means of electronic control. Such an argument is believed to be overly broad and unsupportable, and is further believed to be the product of impermissible hindsight.

Accordingly, claims 19, 25, and 31 are believed to patentably define over the cited combination.

#### B. Dependent Claim 20

In the Office action it was alleged that “McIntosh teaches the actuator being a first actuator (first motor), the device further comprising a second actuator (second motor), the local controller being configured to output the control signal to the first and second actuators, the first and second actuators configured to produce the haptic feedback (column 2, lines 42-43, the first and second actuators are taught by the use of the two motors which further provide haptic feedback the use of two motors for performing feedback).” This is an inaccurate interpretation of McIntosh. McIntosh makes clear that only one motor provides haptic feedback. (See col. 5, lines -24). The remaining motor is used to move the load. (See col. 1, lines 41-45). Therefore, it is submitted that a *prima facie* case of obviousness is not present with respect to dependent claim 20.

#### C. Remaining Dependent Claims


Considering that the dependent claims include the features of the independent claims from which they depend, the dependent claims are patentable to the extent that the independent claims are patentable. It is submitted, therefore, that a *prima facie* case of obvious is not present with respect to the remaining dependent claims for the reasons set forth above with respect to the independent claims.

#### **IV. Conclusion**

It is respectfully requested that the claims be examined and in view of the amendments and remarks made above. A notice of allowance is earnestly solicited. If the Examiner has any questions or needs any additional information, the Examiner is invited to contact the undersigned. Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,  
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